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6 Attorneys for Defendant
AT&T MOBILITY SERVICES LLC

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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
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11 TROY STOUNDR,

12 Plaintiff,

13 vs.

14 AT&T MOBILITY, LLC, a foreign
15 limited-liability company and DOES 1-50,
inclusive;

16 Defendant.

Case No. 2:20-cv-00910-KJD-NJK

**STIPULATION AND [PROPOSED] ORDER
DISMISSING ACTION PENDING
ARBITRATION**

17 WHEREAS Plaintiff Troy Stoudnor (“Plaintiff”) and Defendant AT&T Mobility Services
18 LLC (erroneously named in the Complaint as “AT&T Mobility, LLC” and hereinafter referred to
19 “Defendant”) (collectively the “Parties”), have agreed to submit their claims to arbitration pursuant to
20 an arbitration agreement between the Parties in connection with Plaintiff’s employment with
21 Defendant; and
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23 WHEREAS the Parties have met and conferred and agree that it would be in the best interests
24 of judicial economy and in the best interests of the Parties to move this action to arbitration and
25 stipulate to dismissal of this action, without prejudice;
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27 NOW THEREFORE, the Parties, through their respective counsel hereby stipulate and
28 respectfully request that the Court orders as follows:

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2 1. This matter shall hereby be dismissed, without prejudice, pending resolution of the
3 arbitration (i.e., through settlement or arbitral decision) brought by Plaintiff against Defendant,
4 as well as pending the resolution of all claims and counterclaims that may be asserted in response
5 by Defendant against Plaintiff during arbitration.
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7 2. The Court shall retain jurisdiction as may be required prior to the issuance of the final
8 award and resolution of all claims in arbitration for the purpose of enforcing the arbitration agreement;
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10 3. The Court shall retain jurisdiction over this matter following the issuance of the
11 final award and resolution of all claims in arbitration for the purpose of enforcing the arbitrator's
12 final decision or award; and
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1 4. This dismissal, without prejudice, shall not prevent either party from asserting any
2 objection or defense, including those based on jurisdiction or venue, in the event that this action
3 returns to Court.
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5 IT IS SO STIPULATED.

6 Dated: July 7, 2020

 Dated: July 7, 2020

7 Respectfully submitted,

 Respectfully submitted,

9 /s/ Joseph R. Ortuno, Esq.

/s/ Z. Kathryn Branson, Esq.

10 DANIEL R. WATKINS, ESQ.
11 JOSEPH R. ORTUNO, ESQ.
 WATKINS & LETOFSKY, LLP

 Z. KATHRYN BRANSON, ESQ.
 LITTLER MENDELSON, P.C.

12 Attorneys for Plaintiff
13 TROY STOUDNOR

 Attorneys for Defendant
 AT&T MOBILITY SERVICES LLC

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16 **IT IS SO ORDERED.**

17 Dated: _____ July 8 _____, 2020.

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19 
20 UNITED STATES DISTRICT COURT
21 JUDGE